

May 8, 2007

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Communication, WC Docket No. 01-92

Dear Ms. Dortch:

The parties listed below, which include providers from all segments of the telecommunications industry, support changes to the Commission's call labeling and signaling rules that would require interconnected common carriers to pass to each other, without alteration, information necessary for billing. However, the undersigned parties have all opposed both the Missoula Plan and the Interim Phantom Traffic Solution and Uniform Process for the Exchange of Call Detail Records proposed by the Missoula Plan Proponents ("Missoula Phantom Traffic Proposal"). While the undersigned may not agree on every aspect of Phantom Traffic reform, they are unified in their opposition to the Missoula Phantom Traffic Proposal.

The undersigned parties agree that the Missoula Phantom Traffic Proposal (1) is overly broad and complicated and significantly disproportionate to the actual size of the problem, (2) imposes unnecessary, costly, and discriminatory burdens on carriers, and (3) would not materially assist carriers in the resolution of disputes concerning what intercarrier compensation charges to bill under the Communications Act of 1934, as amended. In addition to these concerns, each sector of the widely diverse group opposing the Missoula Phantom Traffic Proposal has its own particular, and often very extensive, problems with it.

Most important, this filing demonstrates that, contrary to filings submitted by proponents of the Missoula Phantom Traffic Proposal, the Proposal is not supported in any way by a consensus of the industry. Rather, a diverse cross-section of the industry listed below opposes the Missoula Phantom Traffic Proposal. Accordingly, the Missoula Phantom Traffic Proposal is not the appropriate vehicle for reforming the intercarrier compensation system and thus should not serve as the framework for future discussions.

The Commission's goal should be to resolve the problem of unidentifiable traffic without imposing additional, complicated, and unnecessary burdens on the industry. We look forward to the opportunity to participate in the FCC process to resolve particular problems with the current scheme for intercarrier compensation reform in a way that benefits consumers, encourages the deployment of new technologies, allows competitive markets to develop and more closely matches the size of the problem.

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Sincerely,

Alltel Communications, Inc.
Cavalier Communications
COMPTEL
General Communication, Inc. (GCI)
iBasis
McLeodUSA Telecommunications Services, Inc.
National Cable & Telecommunications Association
New Global Telecom
NuVox Communications
One Communications Corp.
Pac-West Telecomm, Inc.
RCN Telecom Services, Inc.
The Voice on the Net (VON) Coalition
Time Warner Telecom
T-Mobile U.S.A., Inc.
USA Datanet
Verizon
XO Communications, LLC